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VIA ELECTRONIC MAIL

Re: **State of Oklahoma v. Tyson, et al.** U.S. District Court for the Northern District of Oklahoma Case No. 05-CV-00329-GKF-SAJ

Dear Mr. Graves:

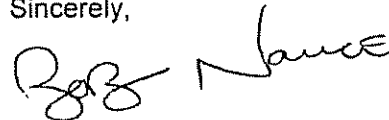
Theresa Hill has informed us that she has shared with you our letter of August 24, 2007 in which we proposed consolidated depositions of the State's 30(b)(6) witnesses in response to the five notices which the Cargill Defendants have served. Copies of these notices are attached hereto for your convenience.

Counsel for the Cargill Defendants have indicated their reluctance to consolidate their Rule 30(b)(6) depositions, based upon the assertion that they wish to ask questions specific to their clients. We have asked the Cargill Defendants to reconsider that position in light of the fact that, as evidenced by the responses to extensive and overlapping written discovery served upon the State, defense counsel, including counsel for the Cargill Defendants, understand full well that, for many of the areas of inquiry they propose, the answers will be the same or similar for all of the Defendants.

We are now asking you directly if, on behalf of your clients, you are willing to organize a consolidated set of depositions of the State's 30(b)(6) witnesses on the general topic areas proposed by the Cargill Defendants. We pose this question without waiving any objections to the Rule 30(b)(6) notices which the Cargill Defendants have served upon the State, but in an effort to streamline discovery and minimize expense for the State and the Defendants as well.

Please advise if you are willing to proceed with discussions toward such a consolidated set of 30(b)(6) depositions.

Sincerely,



Robert A. Nance  
FOR THE FIRM